

DORA V. WATERS and
FLOYD K. WATERS, her husband
PLAINTIFFS

: NO. 15771 EQUITY

VS.

: IN THE CIRCUIT COURT FOR

CLARENCE S. LONG and
HAZEL I. LONG, his wife
DEFENDANTS

: FREDERICK COUNTY, IN EQUITY

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Dora V. Waters and Floyd K. Waters, her husband, by W. Jerome Offutt, their Solicitor, respectfully shows:

FIRST: That your Orators, Dora V. Waters and Floyd K. Waters, her husband, are residents of Frederick County, State of Maryland.

SECOND: That the Defendants, Clarence S. Long and Hazel I. Long, his wife, are non-residents of the State of Maryland and that their last known address is Bolivar, West Virginia.

THIRD: That by Deed dated the 20th day of May, 1943, the People's National Bank of Brunswick, Maryland, a body corporate, did grant and convey, in fee simple, unto the Defendant, Clarence S. Long and your Oratrix, Dora V. Waters, who was then his wife, Dora V. Long, all that lot, piece or parcel of ground situate, lying and being near the town of Knoxville, Frederick County, Maryland, containing sixty-one square perches of land, more or less, having a frontage of four perches on the South side of the public road leading from Knoxville, Maryland, to Brunswick, Maryland, which said Deed is recorded in Liber 439, folio 28, one of the Land Records of Frederick County, a certified copy being herewith filed as "Exhibit Deed" and prayed to be considered as a part hereof.

FOURTH: That your Oratrix, Dora V. Waters and the Defendant, Clarence S. Long, were divorced A VINCULO MATRIMONII by a Decree of your Honorable Court the 19th day of November, 1945, a certified copy of said Decree being herewith filed as "Exhibit Divorce" and prayed to be considered as a part hereof, and your Oratrix, Dora V. Waters, is informed and does thus aver that said divorce transformed the ownership of said real estate to a tenancy in common.

FIFTH: That your Oratrix, Dora V. Waters, has since intermarried with a certain Floyd K. Waters on the 22nd day of December, 1945; and that the Defendant, Clarence S. Long, has since intermarried with a certain Hazel I. Jones, on the 9th day of January, 1946.